Homestake Mining Company Uranium Mill Superfund Site

Grants, Cibola County, New Mexico

Update for Congressional Staff Senators Heinrich and Udall

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PRESENTATION OUTLINE

- Regulatory Authorities Roles and Responsibilities
- Superfund Program Overview
- Site Description
- Key Issues of BVDA
- Upgradient Ground Water Impacts
- USGS Background Study
- Next Steps
- Path Forward Schedule





Historic Site Photo

Federal Regulatory Responsibilities NRC - EPA - DOE

- Nuclear Regulatory Commission [NRC]
 - Regulatory agency for closure of inactive uranium mill sites
 - 1978 Uranium Mill Tailing Radiation Control Act [UMTRCA]
 - National closure standards
 - Ground water standards (or background or Alternate Concentration Limits [ACLs])
- EPA
 - Remedial agency (1980 Superfund Law)
 - Selects site-specific remedies
 - Technical evaluation of contamination, risk, and cleanup options
 - Record of Decision [ROD]
 - Ground water standards (or background or ACLs)
- Department of Energy [DOE]
 - Long-term custodian of UMTRCA sites
 - After closure and EPA ROD satisfied

State of New Mexico Regulatory Responsibilities



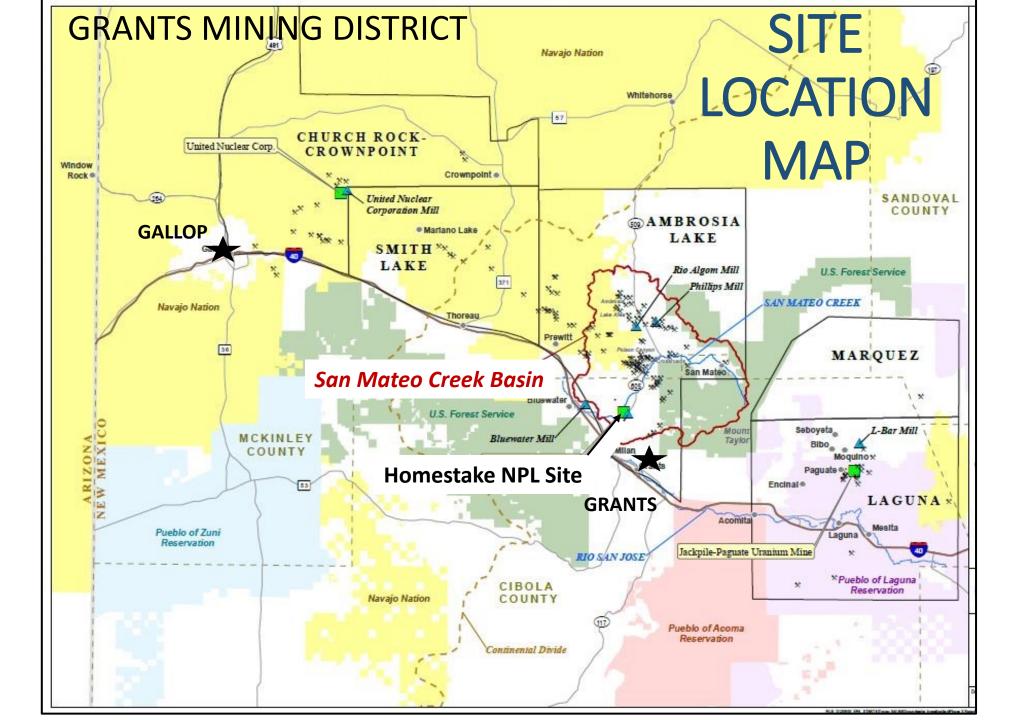
- NM Environment Department (NMED)
 - Regulates ground water pursuant to NM Water Quality Act
 - Ground water discharge permitting program
 - Ground Water Standards (or Background or ACLs)
- Office of State Engineer (OSE)
 - Regulates well permitting, construction, and abandonment

SUPERFUND PROGRAM OVERVIEW



- CERCLA Comprehensive Environmental Response, Compensation and Liability Act
 - Known as Superfund Law
 - Authorizes funds for cleanup of most polluted sites (National Priorities List or NPL)
- Objective Reduce or eliminate threats to human health and environment
- Respond to releases or threatened releases of hazardous substances
 - Emergency or Remedial Response

The Superfund Process **Preliminary** HRS Assessment and Score* **Site Inspection Site Evaluation NPL Listing Record of Decision** (ROD) and Public Responsiveness Comments Summary Feasibility Study (FS) Remedy Selection **Proposed Plan** Remedial Design (RD) NPL Operation and **Deletion** Remedial Maintentance Action (RA) * Hazard Ranking System

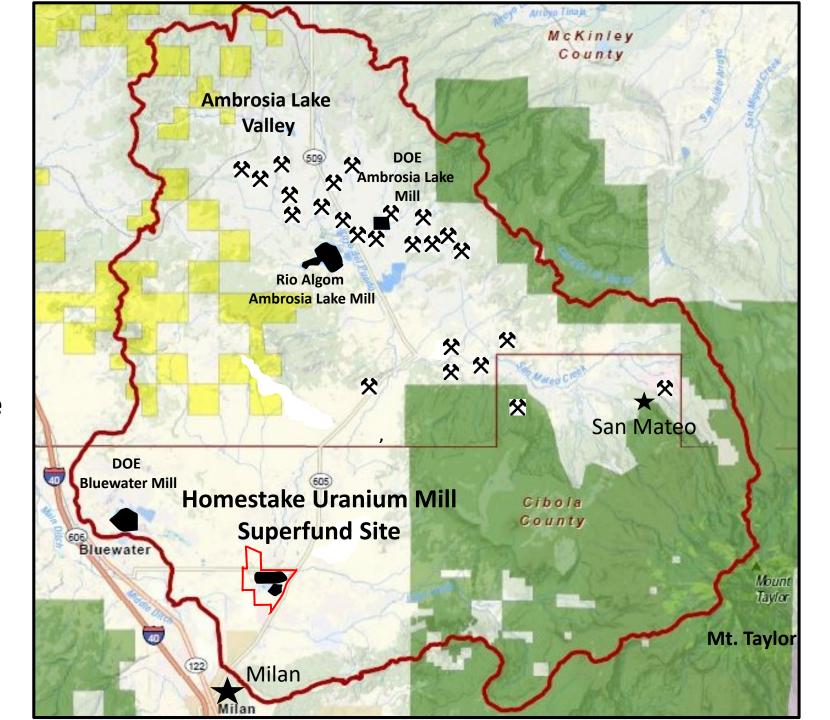


Site Location Within San Mateo Creek Basin

Area of Extensive Uranium Mining

85 Legacy Mines 4 Uranium Mills

★ Wet Mine





GROUND WATER IMPACT

- Tailing fluids seeped from unlined tailing impoundments
 - Contamination discovered in 1960
 - Radionuclides and heavy metals
- Private water wells contaminated off site
- Placed on NPL in 1983
- Hook-ups to municipal water supply provided by Homestake in 1985
 - Settlement Agreement with EPA
 - Included 10 years of paying water usage
 - Large reduction in risk
- Ground water cleanup ongoing for 42 years
 - Initially under State authority in 1976
 - Subsequently under U.S. NRC authority in 1986 Radiological Source Materials License
 - EPA/NRC signs Memorandum of Understanding 1993

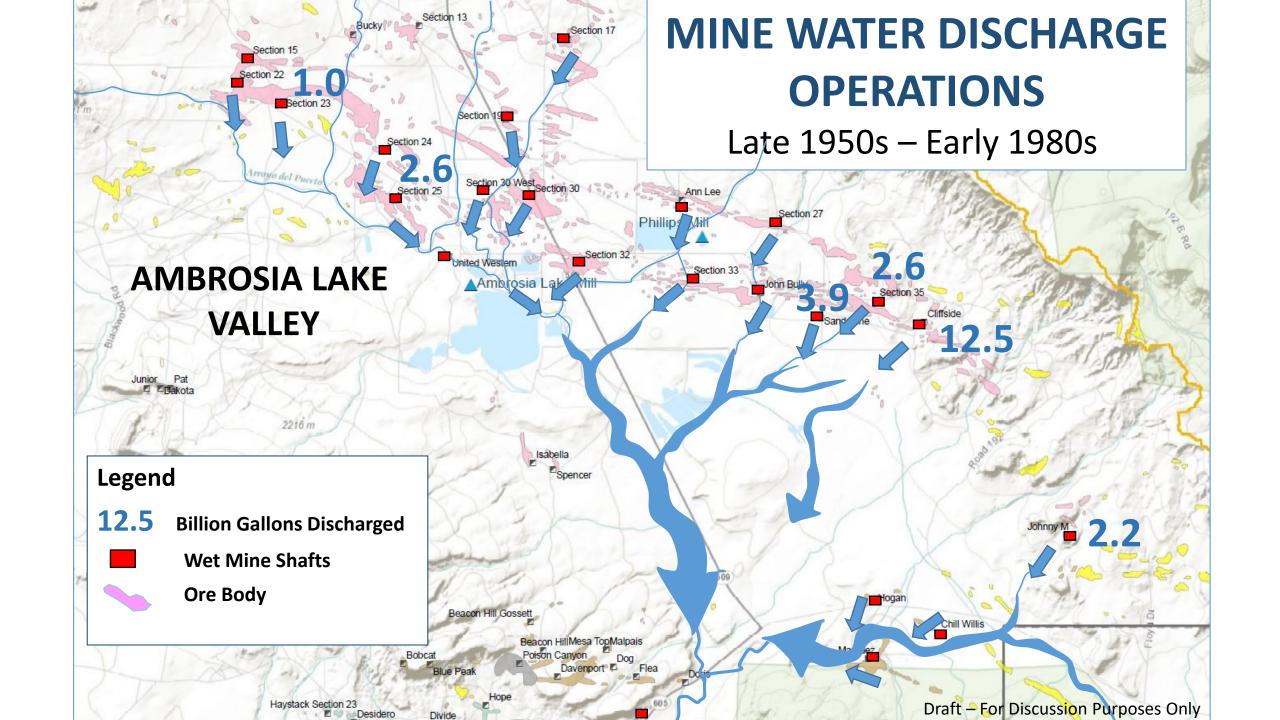
KEY ISSUES RAISED BY BLUEWATER VALLEY DOWNSTREAM ALLIANCE (BVDA)

- Opposes ground water cleanup levels
 - Established by NRC in 2006
 - Uranium and selenium levels based on background
 - Five times higher than federal drinking water standards
- Suggests cleanup levels based on flawed background study by Homestake
- Wants cleanup levels changed to standards

SITE GROUND WATER CONDITIONS VERY COMPLEX

- Upgradient impacts from legacy mining industry may be factor
 - Tens of billions of gallons of contaminated mine water discharged to basin (1950s – 1980s)
- Currently being investigated by EPA and New Mexico
 - San Mateo Creek Basin Ground Water Investigation





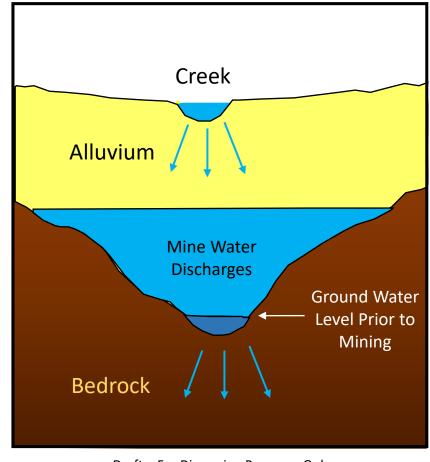


HOW DID MINE DEWATERING OPERATIONS AFFECT GROUND

WATER?

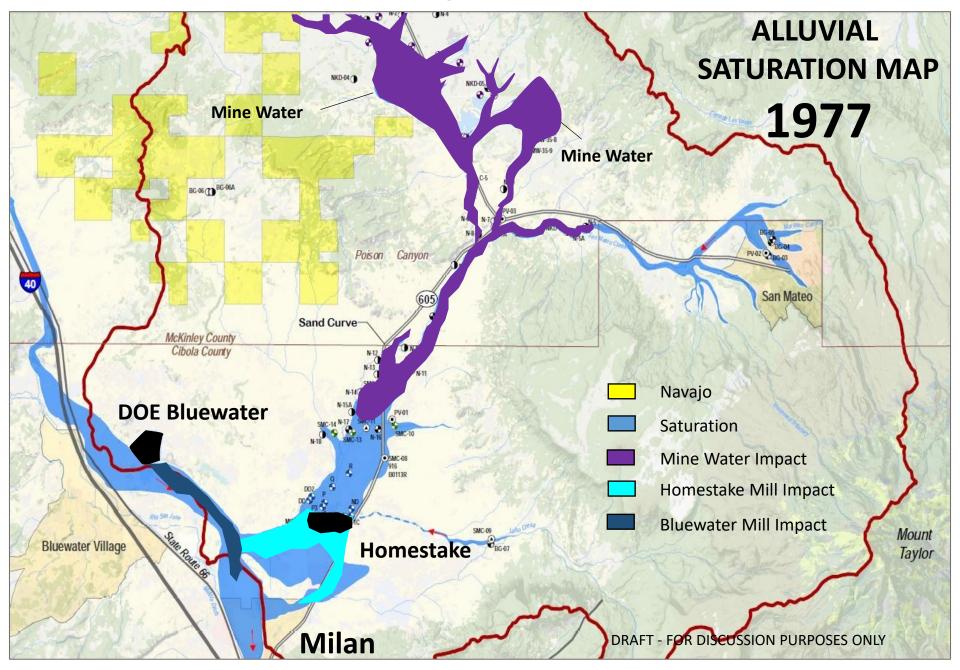
 Discharged billions of gallons of mine water to creeks and arroyos

- Water infiltrated into ground
- Increased amount of ground water in alluvial sediments and bedrock
- Changed quality of ground water

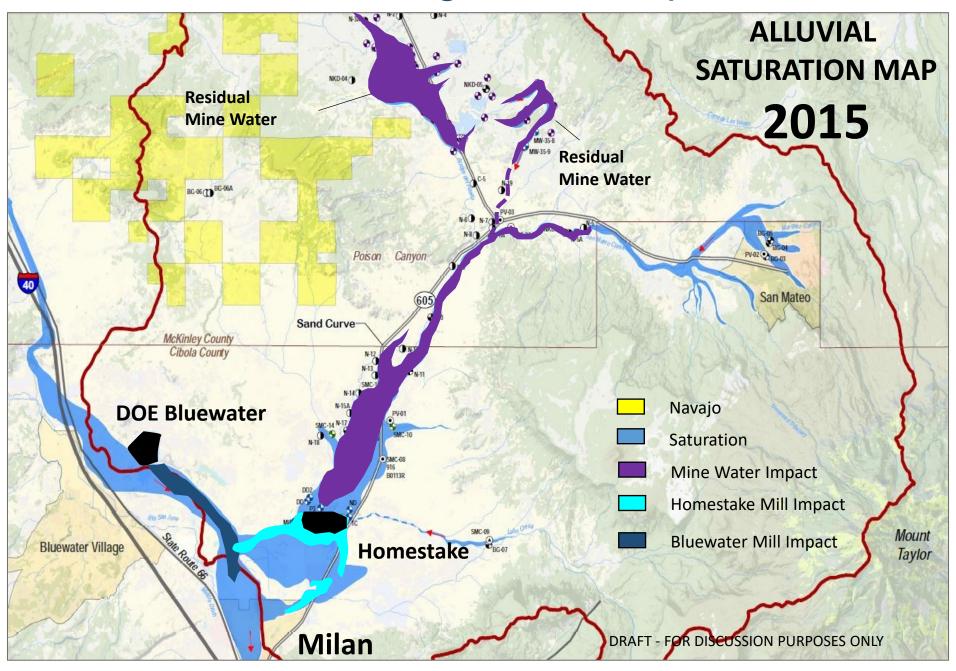


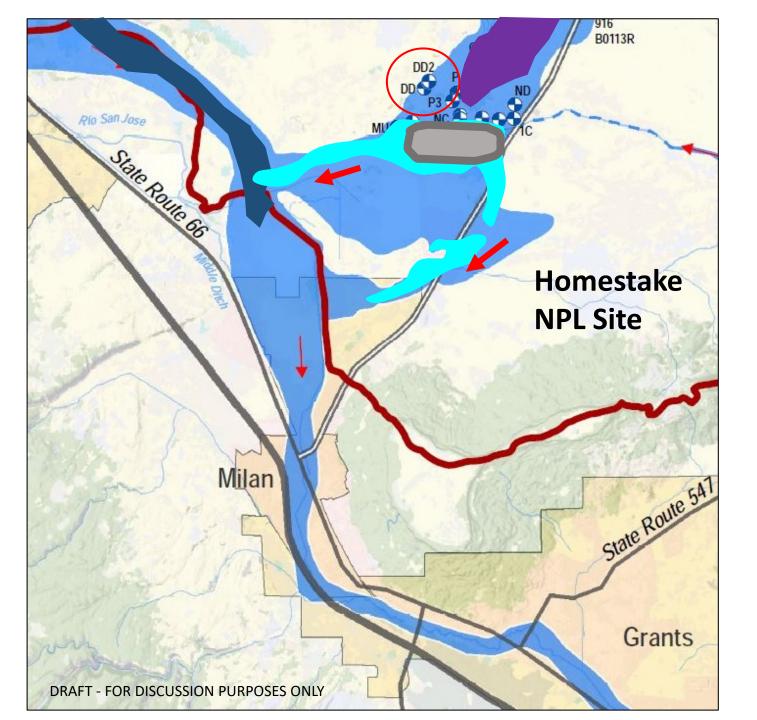
Draft – For Discussion Purposes Only Not to Scale

Mine Discharge Water Impacts



Mine Discharge Water Impacts



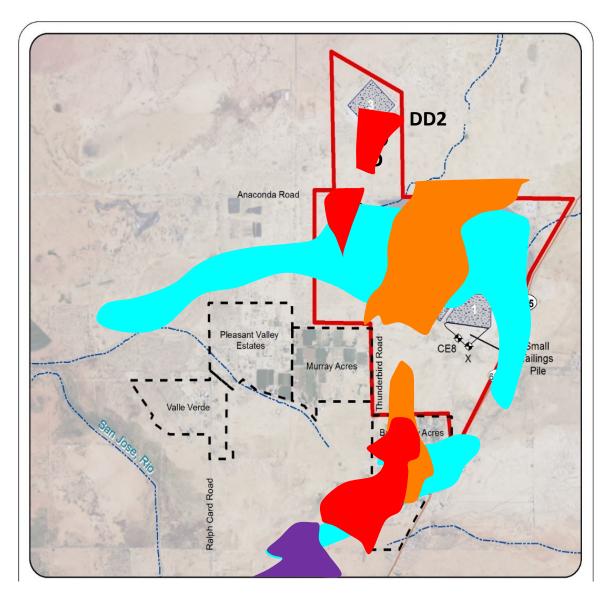


HISTORICALLY HIGH URANIUM LEVELS IN UPGRADIENT BACKGROUND WELLS

160 micrograms/liter
Established Uranium
Cleanup Level - 2006

30 micrograms/liter
Federal Drinking Water
Standard

SITE MAP SHOWING EXTENT OF GROUND WATER CONTAMINATION



LEGEND

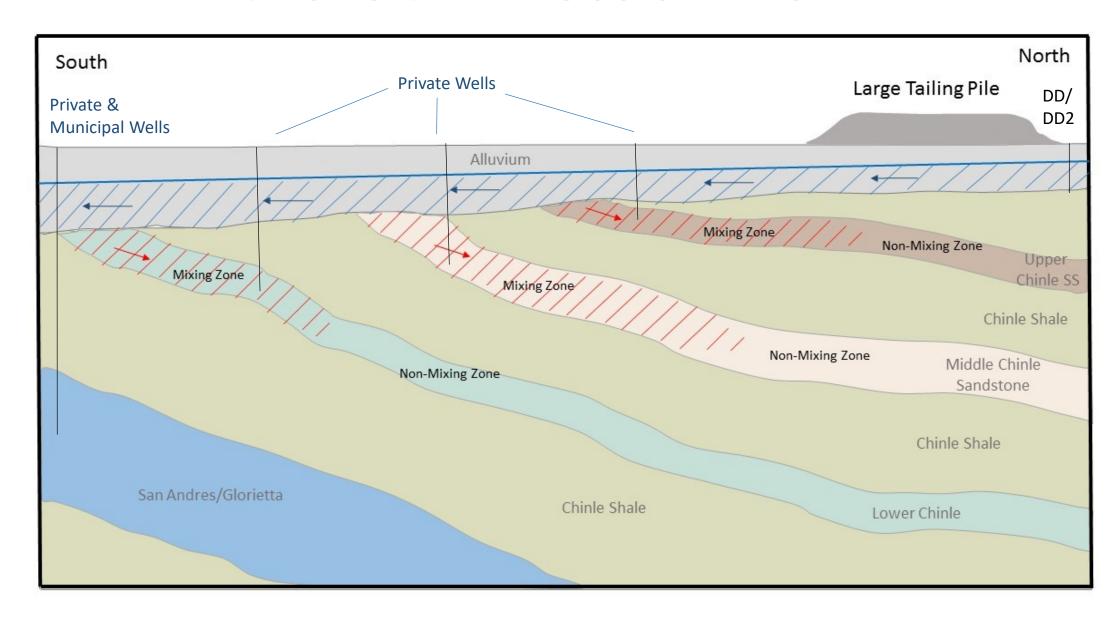
Alluvium Impact

Bedrock Aquifers

- Upper Chinle Sandstone Impact
- Middle Chinle Sandstone Impact
- Lower Chinle Sandstone Impact

All impacted aquifers are used for drinking water supply at private wells!

GEOLOGIC CROSS SECTION



GROUND WATER REMEDY

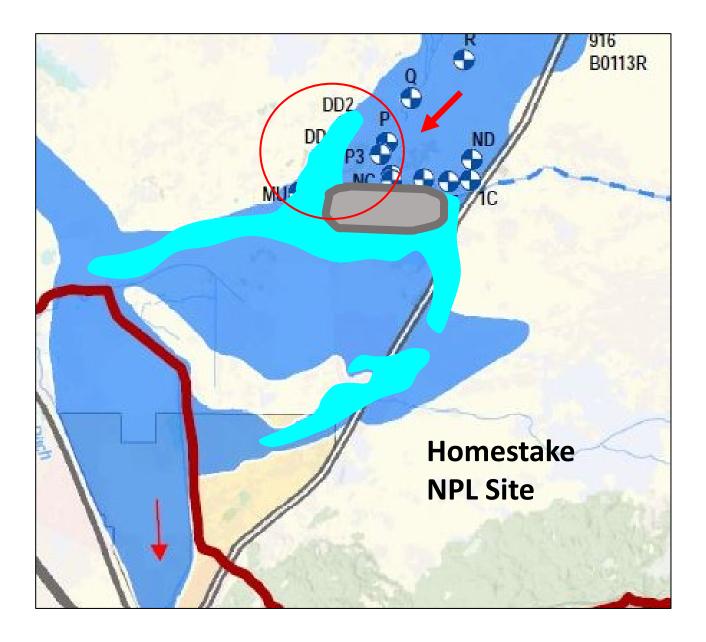
- Flushing of tailing pile (discontinued)
- Extraction and injection of water
 - Hydraulic Containment
 - Restore aquifers to cleanup levels
- Treatment of water
 - Reverse Osmosis
 - Zeolite filtration beds
- Evaporation of contaminated water
- Land application of contaminated water (discontinued)



Zeolite Filtration System



R.O. Water Treatment Plant



BVDA CHALLENGES HOMESTAKE BACKGROUND LEVELS

- BVDA Consultant (Dr. Tom Meyer) proposes alternative model for background in 2015
- BVDA requests EPA hire third party to review Meyer's report
- EPA engages US Geological Survey
- USGS reviews work, proposes additional study to resolve issues

USGS BACKGROUND STUDY

- Objective to determine source of high uranium upgradient
 - Natural vs Mine Water vs Homestake
- Study initiated in 2016
 - EPA engaged BVDA to provide comments on USGS study
- USGS preparing papers for journal publication in 2018
 - USGS provided multiple updates to BVDA/Consultant
 - USGS policy does not allow for release of draft papers
- BVDA concerned USGS findings will not support Consultant's model



NEXT STEPS IN REASSESSMENT OF **GROUND WATER CLEANUP LEVELS**



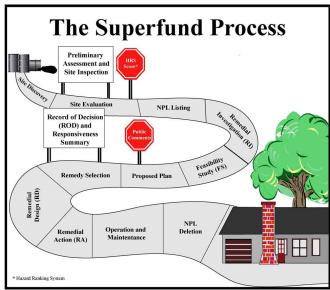
- EPA will seek community input on USGS published papers [★]
 - And all other stakeholders
- Assess need to revise GW cleanup levels
 - USGS Papers
 - Stakeholder Comments on USGS Papers
 - EPA San Mateo Creek Basin Ground Water Study



- Accept current background levels or require recalculation for all aquifers
- Seek input on decision from all stakeholders
- Direct Homestake to recalculate background, if appropriate
 - Likely to extend timeframe for completing ground water cleanup

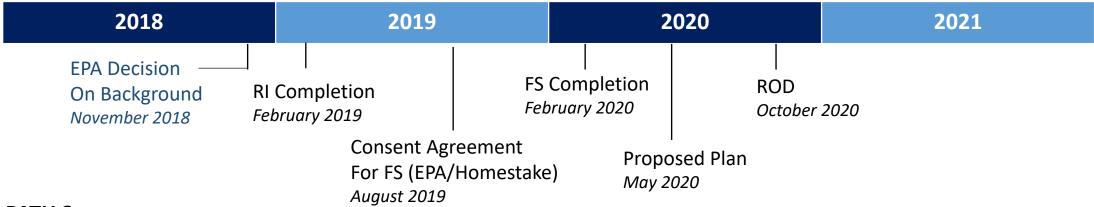
RI/FS EQUIVALENCY PROCESS ONGOING

- EPA determines CERCLA quality cleanup needed to justify site delisting
 - RI/FS Equivalency and Record of Decision required
- Homestake is currently evaluating GW corrective action for RI/FS Equivalency
 - Submitted draft RI Equivalency Report in 2014
- Further progress on draft RI Report is pending decision on background



PATH FORWARD SCHEDULE

PATH 1
EPA Approves Current Background



PATH 2
EPA Requires Revision to Background

